

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURTBY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING**OFFENSE CHARGED**18 U.S.C. § 1028(f) - Conspiracy
to Unlawfully Transfer or Use a
Means of Identification of Another

- ☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

E-filing**PENALTY:**15 years imprisonment; \$250,000 fine; 3 years supervised
release; \$100 special assessmentName of District Court, and/or Judge/Magistrate Location
NORTHERN DISTRICT OF CALIFORNIA**FILED**

JUL 26 2007

DEFENDANT - U.S.

ANDRE MATTHEWS

DISTRICT COURT NUMBER

CR07-00488RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND**CW****DEFENDANT****IS NOT IN CUSTODY**

- 1) ☐ Has not been arrested, pending outcome this proceeding.
If not detained give date any prior summons
was served on above charges _____
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District) _____

IS IN CUSTODY

- 4) ☐ On this charge
- 5) ☒ On another conviction } ☐ Fed'l ☐ State
- 6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of Institution

Martinez Detention Facility

Has detainer been filed? ☐ Yes ☐ No } If "Yes" give date filed _____**DATE OF ARREST**

Month/Day/Year _____

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year _____

☐ This report amends AO 257 previously submitted**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

UNITED STATES POSTAL INSPECTION SERVICE

☐ person is awaiting trial in another Federal or State
Court, give name of court _____☐ this person/proceeding is transferred from another
district per (circle one) FRCP 20, 21 or 40. Show
District _____☐ this is a re prosecution of
charges previously dismissed
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motion of:☐ U.S. Att'y ☐ Defense☐ this prosecution relates to a
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defendant☐ prior proceedings or appearance(s)
before U.S. Magistrate regarding
this defendant were recorded underSHOW
DOCKET NO. _____MAGISTRATE
CASE NO. _____Name and Office of Person
Furnishing Information on
THIS FORM**SCOTT N. SCHOOLS**☒ U.S. Att'y ☐ Other U.S. AgencyName of Asst. U.S. Att'y
(if assigned)**ALICIA FENRICK, AUSA****ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT Bail Amount: NO BAIL

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address: _____

*Where defendant previously apprehended on complaint, no new summons
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Date/Time: _____

Before Judge: _____

Comments: _____

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NORTHERN DISTRICT OF CALIFORNIA**DEFENDANT - U.S.**

TYHESIA BACON

DISTRICT COURT NUMBER

CR07-00488

CW

FILED

JUL 26 2007

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND**DEFENDANT****IS NOT IN CUSTODY**

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been filed? ☐ Yes ☐ NoIf "Yes"
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SCOTT N. SCHOOLS

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(if assigned)

ALICIA FENRICK, AUSA

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E-filing

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☒ U.S. Att'y ☐ Other U.S. AgencyName of Asst. U.S. Att'y
(if assigned)

ALICIA FENRICK, AUSA

Name of District Court and/or Judge/Magistrate Location
NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT - U.S.

JUL 26 2007

JERRY GREEN

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURTNORTHERN DISTRICT OF CALIFORNIA
OAKLAND

DISTRICT COURT NUMBER

CR07-00488

CW

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 THIS FORM

SCOTT N. SCHOOLS

☒ U.S. Att'y ☐ Other U.S. Agency

 Name of Asst. U.S. Att'y
 (if assigned)

ALICIA FENRICK, AUSA

 Name of District Court, and/or Judge/Magistrate Location
 NORTHERN DISTRICT OF CALIFORNIA

FILED

DEFENDANT - U.S.

JUL 26 2007

ALICIA JOHNSON

 RICHARD W. WIEKING
 CLERK, U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND

DISTRICT COURT NUMBER

CR07-00488 CW

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If answer to (6) is "Yes", show name of institution

 Has detainer
 been filed?

☐ Yes
☐ No

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 give date
 filed

**DATE OF
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Month/Day/Year

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Month/Day/Year

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Name of Complainant Agency, or Person (& Title, if any)

UNITED STATES POSTAL INSPECTION SERVICE

☐ person is awaiting trial in another Federal or State
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DOCKET NO.MAGISTRATE
CASE NO.Name and Office of Person
Furnishing Information on
THIS FORM**SCOTT N. SCHOOLS**☒ U.S. Att'y ☐ Other U.S. AgencyName of Asst. U.S. Att'y
(if assigned)**ALICIA FENRICK, AUSA**Name of District Court, and/or Judge/Magistrate Location
NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT - U.S.

LEVI ENRIQUEZ

DISTRICT COURT NUMBER

CR07-00488**CW****FILED**
JUL 26 2007
RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND**DEFENDANT****IS NOT IN CUSTODY**

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If answer to (6) is "Yes", show name of Institution

Has detainer
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Date/Time:

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release; \$100 special assessmentName of District Court, and/or Judge/Magistrate Location
NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT - U.S.

KENYATA WILLIAMS

DISTRICT COURT NUMBER

CR07-00488

CW

DEFENDANT**IS NOT IN CUSTODY**

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Month/Day/Year _____

☐ This report amends AO 257 previously submitted**PROCEEDING**

Name of Complainant Agency, or Person (to file by)

UNITED STATES POSTAL INSPECTION SERVICE

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before U.S. Magistrate regarding
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DOCKET NO. _____MAGISTRATE
CASE NO. _____Name and Office of Person
Furnishing Information on
THIS FORM

SCOTT N. SCHOOLS

☒ U.S. Att'y ☐ Other U.S. AgencyName of Asst. U.S. Att'y
(if assigned)

ALICIA FENRICK, AUSA

ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**☐ SUMMONS ☐ NO PROCESS*☒ WARRANT

Bail Amount: NO BAIL

If Summons, complete following:

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Name of Complainant Agency, or Person (& Title, if any)

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THIS FORM**SCOTT N. SCHOOLS**☒ U.S. Att'y ☐ Other U.S. AgencyName of Asst. U.S. Att'y
(if assigned)

ALICIA FENRICK, AUSA

Name of District Court, and/or Judge/Magistrate Location
NORTHERN DISTRICT OF CALIFORNIA**FILED****JUL 26 2007**

DEFENDANT - U.S.

ASHAKI GREEN

DISTRICT COURT NUMBER

CR07-00488**CW****DEFENDANT****IS NOT IN CUSTODY**

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- 4) ☐ On this charge
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If answer to (6) is "Yes", show name of institution

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NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT - U.S.

KELVIN ARNOLD

DISTRICT COURT NUMBER

CR07-00488

CW

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ALICIA FENRICK, AUSA

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(if assigned)

ALICIA FENRICK, AUSA

Name of District Court, and/or Judge/Magistrate Location
NORTHERN DISTRICT OF CALIFORNIA**FILED**

DEFENDANT - U.S.

JUL 26 2007

CORY KAUTZMAN

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLANDDISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

CR07-00488 CW

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motion of:☐ U.S. Att'y ☐ Defense☐ this prosecution relates to a
pending case involving this same
defendant☐ prior proceedings or appearance(s)
before U.S. Magistrate regarding
this defendant were recorded underSHOW
DOCKET NO.MAGISTRATE
CASE NO.Name and Office of Person
Furnishing Information on
THIS FORM**SCOTT N. SCHOOLS**☒ U.S. Att'y ☐ Other U.S. AgencyName of Asst. U.S. Att'y
(if assigned)**ALICIA FENRICK, AUSA**Name of District Court, and/or Judge/Magistrate Location
NORTHERN DISTRICT OF CALIFORNIA**FILED****JUL 26 2007**

DEFENDANT - U.S.

DANIELLE REYES

DISTRICT COURT NUMBER

CR07-00488 CW**DEFENDANT****IS NOT IN CUSTODY**

- 1) ☒ Has not been arrested, pending outcome this proceeding.
If not detained give date any prior summons
was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) ☐ On this charge
- 5) ☐ On another conviction
- 6) ☐ Awaiting trial on other charges } ☐ Fed'l ☐ State
- If answer to (6) is "Yes", show name of Institution

Has detainer
been filed? ☐ Yes ☐ NoIf "Yes"
give date
filed**DATE OF
ARREST**

Month/Day/Year

Or... if Arresting Agency & Warrant were not

Month/Day/Year

**DATE TRANSFERRED
TO U.S. CUSTODY**☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT Bail Amount: NO BAIL

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

*Where defendant previously apprehended on complaint, no new summons
or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

Comments:

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURTBY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING**OFFENSE CHARGED**18 U.S.C. § 1028(f) - Conspiracy
to Unlawfully Transfer or Use a
Means of Identification of Another☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony**PENALTY:**15 years imprisonment; \$250,000 fine; 3 years supervised
release; \$100 special assessment**E-filing****PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

UNITED STATES POSTAL INSPECTION SERVICE

☐ person is awaiting trial in another Federal or State
Court, give name of court☐ this person/proceeding is transferred from another
district per (circle one) FRCrP 20, 21 or 40. Show
District☐ this is a reprosecution of
charges previously dismissed
which were dismissed on
motion of:☐ U.S. Att'y ☐ Defense☐ this prosecution relates to a
pending case involving this same
defendant☐ prior proceedings or appearance(s)
before U.S. Magistrate regarding
this defendant were recorded underSHOW
DOCKET NO.MAGISTRATE
CASE NO.Name and Office of Person
Furnishing Information on
THIS FORM**SCOTT N. SCHOOLS**☒ U.S. Att'y ☐ Other U.S. AgencyName of Asst. U.S. Att'y
(if assigned)

ALICIA FENRICK, AUSA

Name of District Court and U.S. Magistrate Location
NORTHERN DISTRICT OF CALIFORNIA**FILED**
JUL 26 2007**DEFENDANT - U.S.**RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

BOBBY ALEXANDER

DISTRICT COURT NUMBER

CR07-00488**CW****DEFENDANT****IS NOT IN CUSTODY**

- 1) ☐ Has not been arrested, pending outcome this proceeding.
If not detained give date any prior summons
was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) ☐ On this charge
- 5) ☒ On another conviction
- 6) ☐ Awaiting trial on other charges
- } ☐ Fed'l ☐ State

If answer to (6) is "Yes", show name of Institution

Martinez Detention Facility

Has detainer
been filed? ☐ Yes ☐ NoIf "Yes"
give date
filed**DATE OF
ARREST**

Month/Day/Year

Or... if Arresting Agency & Warrant were not

**DATE TRANSFERRED
TO U.S. CUSTODY**

Month/Day/Year

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☐ NO PROCESS*☒ WARRANT Bail Amount: NO BAIL

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

*Where defendant previously apprehended on complaint, no new summons
or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____

Before Judge: _____

Comments: _____

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA
CRIMINAL DIVISION

VENUE: OAKLAND

CR07-00488 CW

UNITED STATES OF AMERICA,

v.

ANDRE MATTHEWS, TYHESIA BACON,
JERRY GREEN, ALICIA JOHNSON,
LEVI ENRIQUEZ, KENYATA WILLIAMS,
ASHAKI GREEN, KELVIN ARNOLD,
CORY KAUTZMAN, DANIELLE REYES, and
BOBBY ALEXANDER,

E-filing

FILED

JUL 26 2007

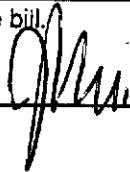
RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

DEFENDANT.

INDICTMENT

18 U.S.C. § 1028(f) - Conspiracy to Unlawfully
Transfer or Use a Means of Identification of Another

A true bill.



Foreman

Filed in open court this 26th day of

July 2007

Clerk

Bail, \$

Wayne D. Bazil *No bail arrest warrants for each & all defendants.*
7-26-07

SCOTT N. SCHOOLS (SC 9990)
United States Attorney

FILED

JUL 26 2007

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

E-filing

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

CR07-00488 CW

UNITED STATES OF AMERICA,

No.

Plaintiff,

v.

VIOLATIONS: 18 U.S.C. § 1028(f) -
Conspiracy to Unlawfully Transfer or Use a
Means of Identification of Another

ANDRE MATTHEWS,
TYHESIA BACON,
JERRY GREEN,
ALICIA JOHNSON,
LEVI ENRIQUEZ,
KENYATA WILLIAMS,
ASHAKI GREEN,
KELVIN ARNOLD,
CORY KAUTZMAN,
DANIELLE REYES, and
BOBBY ALEXANDER

OAKLAND VENUE

Defendants.

INDICTMENT

The Grand Jury charges:

INTRODUCTION

At all times relevant to this Indictment:

1. Defendant ANDRE MATTHEWS resided in Antioch, California. He was the "owner" of "The BIZZ" and "Dangerous Krew," which were successive and overlapping fictitious business

names given to groups of individuals working together to generate income by means of identity theft and access device fraud.

2. Defendants TYHESIA BACON and KELVIN ARNOLD resided in San Francisco, California and Pittsburgh, California, respectively, and were co-owners of "The BIZZ."

3. Defendant KENYATTA WILLIAMS resided in Antioch, California and was the "President/Sales Executive" of the "The BIZZ." and was also affiliated with "Dangerous Krew."

4. Defendant ASHAKI GREEN resided in Brentwood, California and was the "Administrative Chairman/ President" of "The BIZZ."

5. Defendant JERRY GREEN resided in Antioch, California and was affiliated with "The BIZZ."

6. Defendant LEVI ENRIQUEZ, resided in Antioch, California and was affiliated with "Dangerous Krew."

7. Defendant ALICIA JOHNSON resided in Antioch, California and was affiliated with "Dangerous Krew."

8. Defendant BOBBY ALEXANDER resided in Antioch, California and was affiliated with "The BIZZ"

9. Defendants DANIELLE REYES and CORY KAUTZMAN resided in Antioch, California.

THE CONSPIRACY

10. Beginning on a date unknown to the Grand Jury but no later than April, 2006, to and including May, 2007, in the State and Northern District of California and elsewhere, the defendants,

ANDRE MATTHEWS,
TYHESIA BACON,
JERRY GREEN,
ALICIA JOHNSON,
LEVI ENRIQUEZ,
KENYATA WILLIAMS,
ASHAKI GREEN,
KELVIN ARNOLD,
CORY KAUTZMAN,
DANIELLE REYES, and
BOBBY ALEXANDER

1 did conspire to knowingly transfer and use, without lawful authority and in and affecting
2 interstate commerce, a means of identification of another person with the intent to commit, to
3 aid, and to abet, any unlawful activity that constitutes a violation of Federal law and that
4 constitutes a felony under an applicable State law, in violation of 18 U.S.C. § 1028(a)(7).

5 11. As a result of this offense, the defendants obtained something of value aggregating
6 \$1,000 or more during a one-year period beginning on or about May, 2006, and ending on or
7 about May, 2007.

8 MANNER AND MEANS OF THE CONSPIRACY

9 12. The manner and means by which the conspiracy was sought to be accomplished
10 included, among others, the following:

11 13. Defendants collaborated to create "companies" which they entitled "The BIZZ," and
12 "Dangerous Krew." Through these companies, defendants established protocols, methodologies
13 and procedures for obtaining merchandise and services using the identities and credit of
14 unsuspecting victims. Defendants obtained individuals' true social security numbers and other
15 personal information from several different sources, including but not limited to the following:

- 16 a. credit applications from car dealerships throughout California; and
17 b. credit applications from mortgage companies throughout California.

18 14. Per the "Process and Procedures" established for "The BIZZ" and "Dangerous Krew,"
19 defendants opened credit card accounts and merchant accounts and added themselves as
20 authorized users on victims existing accounts, using stolen social security numbers and other
21 personal information. Defendants used these accounts to order merchandise and services for
22 "The BIZZ," and "Dangerous Krew."

23 15. Defendants often used their own home addresses as well as the addresses of their relatives
24 and associates on the account applications and to receive mail and merchandise related to the
25 accounts.

26 16. Defendants retained the fraudulently obtained merchandise for themselves or stored it as
27 inventory for "The BIZZ" and "Dangerous Krew" to be used for resale and gifts to friends and
28 family.

OVERT ACTS

17. In furtherance of the conspiracy, and to effect the objects of the conspiracy, the following overt acts were committed in the Northern District of California and elsewhere:

ESTABLISHMENT OF "The BIZZ" AND "DANGEROUS KREW."

a. Beginning on a date unknown to the Grand Jury but no later than April, 2006 and continuing to May, 2007, ANDRE MATTHEWS, TYHESIA BACON, KELVIN ARNOLD, ASHAKI GREEN and KENYATTA WILLIAMS established "The BIZZ" and designated themselves as officers of this fictitious company. They drafted an organization chart, business cards and a Process and Procedures guide outlining steps to take to open credit accounts using the names, social security numbers, drivers license numbers and other personal identifying information of unsuspecting individuals whose identities had been compromised.

b. During the same time period ANDRE MATTHEWS, KENYATA WILLIAMS, LEVI ENRIQUEZ and ALICIA JOHNSON created a similar, overlapping organization called "Dangerous Krew" with a similar Process and Procedure guide and business cards depicting "Dangerous Krew" currency.

c. Beginning on a date unknown to the Grand Jury, defendants ANDRE MATTHEWS, TYHESIA BACON, KELVIN ARNOLD, ASHAKI GREEN, KENYATTA WILLIAMS, LEVI ENRIQUEZ and ALICIA JOHNSON acquired personal identifying information of unsuspecting individuals and created extensive profiles of individuals which often included social security numbers, dates of birth, driver's license numbers, mother's maiden names, employment and income information and address and telephone information.

d. Beginning on a date unknown to the Grand Jury but no later than April 2006 and continuing to May, 2007, ANDRE MATTHEWS, TYHESIA BACON, KELVIN ARNOLD, ASHAKI GREEN, KENYATTA WILLIAMS, LEVI ENRIQUEZ and ALICIA JOHNSON used the profiles created to open unauthorized credit accounts in the victims names and add unauthorized users to the victims existing credit accounts at the following retailers: Abercrombie & Fitch, Pottery Barn, Victoria's Secret, Pacsun, Lane Bryant, Eddie Bauer, Buckles, J. Crew, Spiegel, Newport News, Pier 1 Imports, Dell Financial, Staples, Target, Circuit City, Macys,

1 American Eagle, Home Depot, Lowes, Gottschalk's, Best Buys, Zales, Sprint and
2 Overstock.com.

3 e. On or about May 12, 2006, BOBBY ALEXANDER, using a fraudulent California
4 driver's license to impersonate victim Eric P., obtained three Sprint/Nextel cellular phones. One
5 of the phones he purchased, bearing phone number (925) 584-7293, was listed as the "home
6 phone number" on over 50 fraudulently opened merchant accounts and used as the personal
7 cellular telephone of ANDRE MATTHEWS.

8 f. Beginning on a date unknown but no later than December, 2005 and continuing to July,
9 2006, JERRY GREEN obtained at least six (6) fraudulent California driver's licenses in at least
10 six (6) victim's names that bore his likeness. Between December, 2005 and July, 2006, JERRY
11 GREEN opened at least 20 unauthorized accounts in those victims names and made purchases
12 totaling over \$8000.

13 g. On or about February 14, 2007 an on-line account was opened at Lowes in the name of
14 Victor S. without his knowledge or permission. On February 18, 2007 a telephone order was
15 placed for approximately \$1080 worth of merchandise using the newly opened account. On or
16 about February 19, 2007, LEVI ENRIQUEZ and ANDRE MATTHEWS arrived at Lowes
17 located at 1951 Auto Center Drive in Antioch, California and picked up the merchandise ordered
18 the preceding day.

19 h. On or about May 20, 2007, an on-line account was opened at Victoria Secret in the name
20 of victim Julie C. and ALICIA JOHNSON was added as an authorized user on the account.
21 Continuing on the same date, ALICIA JOHNSON entered the Sun Valley Mall branch of
22 Victoria Secret and purchased merchandise in the amount of \$497.95 using the newly opened
23 account. Between on or about February 26, 2007 and May 20, 2007 ALICIA JOHNSON was
24 added as an authorized user on approximately 118 victim accounts.

25 i. On or about May 26, 2007 an on-line account was opened at Victoria Secret in the name
26 of vicim James M. and CORY KAUTZMAN was added as an authorized user on the account.
27 On or about May 30, 2007, CORY KAUTZMAN and DANIELLE REYES entered the Victoria
28 Secret branch located at 2556 Sommersville Road in Antioch, California and purchased

merchandise in the amount of \$487.67 using the newly opened account.

j. On or about May 14, 2007, a Chase Overstock.com Visa account was opened on-line in the name of Calvin K and victim William W. was added as an authorized user. On or about May 28, 2007, ANDRE MATTHEWS, presented a fraudulent California Driver's license in the name of victim William W. bearing MATTHEW'S likeness and a Visa credit card in William W.'s name but associated with victim Calvin K.'s newly opened Chase Overstock.com account to the Best Western Hotel clerk located at 3210 Delta Fair Blvd, Antioch, California for check-in. With these identification documents, ANDRE MATTHEWS checked himself into room 104 and checked CORY KAUTZMAN into room 207. Thereafter, with these same documents, on or about May 30, 2007, ANDRE MATTHEWS, along with CORY KAUTZMAN and DANIELLE REYES, moved into room 124. On or about May 31, 2007, ANDRE MATTHEWS, CORY KAUTZMAN and DANIELLE REYES continued the creation of victim profiles by downloading credit reports of multiple victims from various credit reporting agencies and having them sent as text files to printers located in room 124.

All in violation of Title 18 United States Code, Section 1028(f).

DATED:

July 24, 2007

A TRUE BILL.

FOREPERSON

SCOTT N. SCHOOLS
United States Attorney

STEPHEN CORRIGAN
Acting Chief, Oakland Office

(Approved as to form:)

AUSA FENRICK